

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

MARTIN WEBBER,

*Plaintiff,*

v.

AJAY VIRMANI, M.D., *ET AL.*,

*Defendants.*

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Case No.: 5:18-cv-00042

DR. VIRMANI AND HEART & VASCULAR INSTITUTE OF  
WINCHESTER, LLC.'S OBJECTIONS TO PLAINTIFF'S  
DESIGNATION OF THE DEPOSITION OF GRACE DACUNZO

Defendants Ajay Virmani, M.D. and Heart & Vascular Institute of Winchester, LLC. objects to Plaintiff's Designation of the Deposition of Grace Dacunzo as follows:

1. Defendants object on the grounds as set forth in its Motion and Memorandum in Support to Exclude the Testimony of Grace Dacunzo based on relevance. Defendants restate and incorporates this objection to referenced portions of the deposition below identified by the plaintiff.

- a. Page 10, Line 1 - Page 13, Line 7
- b. Page 13, Lines 15-18
- c. Page 14, Lines 13 - 18
- d. Page 18, Lines 2 -8
- e. Page 23, Line 12 - Page 24, Line 6
- f. Page 34, Line 17 - Page 35, Line 4
- g. Page 35, Lines 12 - 21
- h. Page 63, Line 18 - Page 64, Lines 1 - 25

TimberlakeSmith

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540.885.1517

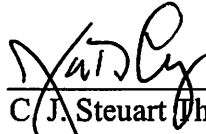
i. Page 70, Lines 3 - 6

AJAY VIRMANI, M.D.

HEART & VASCULAR INSTITUTE  
OF WINCHESTER, LLC.

By Counsel

By:



C. J. Stuart Thomas, III

VSBA # 26279

James D. Mayson

VSBA #47152

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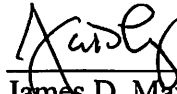
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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2019, I have electronically filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Peter D. Greenspun  
Anastasia T. Kranias  
3955 Chain Bridge Road  
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*Counsel for plaintiff*



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